

**DOCKET NUMBER: YOR920010520US1****REMARKS**

These remarks follow the order of the paragraphs of the office action. Relevant portions of the office action are shown indented and italicized.

*Claim Objections*

1. The applicant presented two claims numbered 33. For examining purposes, the misnumbered claims 33-36 have been renumbered 33-37.

In response, applicants respectfully state that the last four claims were amended to reflect this claim numbering correction.

*Claim Rejections - 35 USC § 102*

2. The following is a quotation of the appropriate paragraphs of 35 U.S.C. 102 that form the basis for the rejections under this section made in this Office action: A person shall be entitled to a patent unless -

(e) the invention was described in ....

3. Claims 31, 36-37 are rejected under 35 U.S.C. 102(e) as being anticipated by US. Patent No. 6,308,213 to Valencia.

a. As per claim 31, Valencia teaches an apparatus for a user using a client device attached to a wireless, circuit-switched, voice telephony network, to interact with at least one service, said apparatus comprising: a telephone modem to receive an incoming call from a client device, and also to receive and transmit data over a telephone network, said telephone modem having a client port through which the apparatus attaches to the telephone network (See col. 3, lines 44-47 and col. 4, lines 14-38) (The remote client is coupled to the ISP that accesses the Internet infrastructure via a PSTN ... The network access server NAS includes a modem for receiving and processing data transmitted from the remote client) ; a dial-in service module to implement dial-in logic for the client device; and a protocol transport module to implement protocols needed to transport data back and forth between a browser application in the client device and a browser server (See col. 3, lines 60-67

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1 and col. 4, lines 1-14) ( the remote client accesses the  
2 Local Area Network trough the dial-up session... and the  
3 remote client can access any of the resources on the LAN ...  
4 the dial-up session uses a L2F protocol to project a  
5 point-to point link level session).

6 In response, applicants respectfully state that Valencia teaches  
7 using ISP and the Internet (18) in any and all circumstances.  
8 Contrary the invention claimed in claim 31 does not require this  
9 as shown in Figures 1, 2 and 4 . As in claim 31, a client device  
10 could dial-in directly to a remote dial-up server attached to the  
11 home distribution network (HDN) using only the cellular voice  
12 network (if desired or necessary) and the PSTN. Thus, there is  
13 no need to involve ISPs or the Internet.

14 Although the above aspect of our invention is clear as presented  
15 in claim 31, claim 31 is amended to underscore this aspect of the  
16 present invention and also explicitly stating that the browser  
17 server is part of the apparatus as Figure 4 shows.

18 Claim 31 is amended to, "directly receive an incoming call from a  
19 client device.," and to include a limitation, "a browser server  
20 module for managing data for remote displaying." These clearly  
21 are not in the cited art. The cited references does not include  
22 a browser server and application, but rather focus exclusively on  
23 establishing a link layer communications path between the client  
24 and the home gateway via an ISP and the Internet. Thus claim 31  
25 is allowable over the cited art. Claims 32-37, which depend on  
26 claim 21 thereon are allowable in themselves and because each  
27 ultimately depends on an allowable claim.

28 b. As per claim 36, Valencia teaches the claimed invention  
29 as described above. Furthermore, Valencia teaches wherein  
30 said dial-in server module triggers at least one particular  
31 module in the apparatus to process any incoming calls and  
32 requests from a client device (See col. 2, lines 10-19).

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1 In response, applicants respectfully state that the cited  
2 reference (col. 2, ln. 10-19) describes the fact that the client  
3 device after it connects to the home gateway, it can be managed  
4 through databases controlled by the local network (i.e., a  
5 control path direction from the home network to the client, which  
6 is opposite to what claim 36 of our invention implies).

7 Furthermore, the cited reference states that the client device  
8 gains access to resources. There is no reference to what these  
9 resources are and we contend that someone skilled in the art  
10 would not find in the cited reference that "...said dial-in  
11 server module triggers at least one particular module in the  
12 apparatus..." Thus claim 36 is allowable over the cited art.

13 *c. As per claim 37, Valencia teaches the claimed invention*  
14 *as described above. Furthermore, Valencia teaches wherein*  
15 *said dial-in server module performs user authentication (See*  
16 *col. 2, lines 34-45)*

17 In response, applicants respectfully state this is a dependent  
18 claim that depends on claim 31. The cited art does not perform  
19 user authentication for the elements of claim 31. Thus claim 37  
20 is allowable over the cited art.

21 *Claim Rejections - 35 use § 103 4.*

22 *The following is a quotation of 35 U.S.C. 103(a) which forms*  
23 *the basis for all obviousness rejections set forth in this*  
24 *Office action:*

25 *(a) A patent may not be obtained though the invention is not*  
26 *identically disclosed or described as set forth in section*  
27 *102 of this title, if the differences between the subject*  
28 *matter sought to be patented and the prior art are such that*  
29 *the subject matter as a whole would have been obvious at the*  
30 *time the invention was made to a person having ordinary*  
31 *skill in the art to which said subject matter pertains.*  
32 *Patentability shall not be negated by the manner in which*  
33 *the invention was made.*

34 *5. Claims 1-3, 5-8, 10, 12, 15-22, 24, 27-30 are rejected*  
35 *under 35 U.S.C. 103(a) as being unpatentable over US. Patent*

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1       Application No. 2002/0068559 to Sharma et al in view of US.  
2       Patent No. 6,735,619 to Sawada.

3       a. As per claims 1 and 29, Sharma et al teaches a method for  
4       a user to interact with at least one remote service,  
5       comprising: said user connecting to a serving entity using a  
6       client device attached to a wireless, circuit-switched,  
7       voice telephony network (See page 2, paragraph [0019] (the  
8       system enables a network manager, operating remotely, to  
9       manage networks through a mobile wireless device). However,  
10      Sharma et al fails to teach obtaining and viewing a list of  
11      accessible remote services from said serving entity;  
12      selecting said at least one remote service from said list;  
13      and accessing and viewing said at least one remote service  
14      in obtaining desired results.

15      Sawada teaches a home network gateway apparatus and home  
16      network device. Furthermore, Sawada teaches wherein the  
17      network gateway displays a list of home ' network devices on  
18      the display of the device (See col. 1, lines 39-'43) and  
19      controlling the home network device via the list menu,  
20      sending control information to the home network device based  
21      on the device information and making the device execute the  
22      operation as instructed (See col. 2, lines 45-52).

23      It would have been obvious to one with ordinary skill in the  
24      art at the time the invention was made to incorporate  
25      obtaining and viewing a list of accessible remote services  
26      from said serving entity; selecting said at least one remote  
27      service from said list; and accessing and viewing said at  
28      least one remote service in obtaining desired results as  
29      taught by Sawada et al in the claimed invention of Sharma et  
30      al in order to make remotely control home network devices  
31      available using wide-area network such as the Internet (See  
32      col. 1, lines 30-34).

33      In response, applicants respectfully state that the cited  
34      reference to Sharma does not make any of the claims in the  
35      present application obvious. Applicants do not concur with the  
36      obviousness stated. The Examiner may not employ elements or  
37      parts of elements in cited references in alleging obviousness.  
38      Furthermore, applicants list particular reasons below why each  
39      claim is not obvious over the cited art. Thus Claims 1-3, 5-8,  
40      10, 12, 15-22, 24, 27-30 are allowable over the cited art.

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1 Sharma (paragraph [0019]) furthermore states "...Once an error  
2 condition is detected on a network, the system enables a network  
3 manager..." Therefore, Sharma's invention centers around a  
4 reactive system and network manager procedure, where first an  
5 error condition is detected and then the network manager takes  
6 actions to remedy this condition --the following paragraph  
7 ([0020]) further underscores this aspect of Sharma's invention by  
8 stating "...The present invention provides methods and systems to  
9 propagate fault and real-time monitoring capability from a  
10 network management server to remote mobile wireless capable  
11 devices..." This reactive operation fundamentally distinguishes  
12 our invention from that of Sharma's.

13 Although, Sawada may indeed teach use of a type of list. However,  
14 Sawada's invention is directed to controlling network devices  
15 using a wide-area computer network such as the Internet (col. 1,  
16 ln. 30-32), which is not what the invention claimed in claims  
17 1-3, 5-8, 10, 12, 15-22,24,27-30. Sawada's invention apparently  
18 teaches about controlling network devices, which, in particular,  
19 make use of the IEEE 1394 serial bus for communication (col. 4,  
20 ln. 5-8). Contrary, invention claimed in claims 1-3, 5-8, 10,  
21 12, 15-22,24,27-30., is directed to controlling services  
22 independently from devices (if any) that are involved in support  
23 of these services or the communication protocols are used for  
24 communicating to the implementors (being software modules or  
25 networked devices) of these services. Therefore the lists that  
26 the present invention claimed in claims 1-3, 5-8, 10, 12,  
27 15-22,24,27-30 refer to are lists for accessing services and not  
28 devices as Sawada teaches.

29 As a result, applicants do not share the examiner's view that  
30 that it would have been obvious to one with ordinary skill in the  
31 art at the time the invention was made to incorporate the use of

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1 lists as taught by Sawada, in the claimed invention of Sharma in  
2 order to make remotely control home network devices available  
3 using wide-area network such as the Internet. This is because a  
4 person with ordinary skills will not have been able to create  
5 services and access and control these services and obtain the  
6 results of the elements of claims 1-3, 5-8, 10, 12,  
7 15-22, 24, 27-30 without the present invention, just starting from  
8 lists that control IEEE 1394-compliant devices.

9 Furthermore, claim 1, is amended to better underscore this aspect  
10 of our invention. Claim 1 is amended to be directed to , "a home  
11 data distribution network, said home data distribution network  
12 comprising an aggregation of at least one communications media  
13 and at least one communications protocol used to access said at  
14 least one remote service from a serving entity," and having a  
15 limitation, "selecting said at least one communications media and  
16 at least one communications protocol that said selected at least  
17 one service uses." The additional clarifications in this claim  
18 is described in col. 2, paragraph 20 of the present invention  
19 09/933,625 (US Patent Application US2003/0041119 A1). This  
20 paragraph describes that the home distribution network comprises  
21 an aggregation of at least one communications and communications  
22 protocols, and therefore to access a service attached to the home  
23 network the step of selecting at least one communications media  
24 and at least one communications protocol has to occur. This  
25 aggregation of networks and protocols and as a consequence the  
26 step of selecting at least one is not taught by either Sharma nor  
27 Sawadan. Thus claim 31 is allowable over the cited art. Claims  
28 32-37, which depend on claim 21 thereon are allowable in  
29 themselves and because each ultimately depends on an allowable  
30 claim.

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1 Likewise, claim 29 is amended to include, "second connecting  
2 means for attaching said apparatus to a communications medium and  
3 using a communications protocols, taken from an aggregation of  
4 communication media and protocols, through which said at least  
5 one remote service can be accessed;" and "second selecting means  
6 for selecting the communications medium and protocol to access  
7 said selected at least one service." Thus claim 29 is allowable.

8 *b. As per claim 2, Sharma teaches the claimed invention as described*  
9 *above. Furthermore, Sharma teaches wherein the client device*  
10 *is portable (See page 3, paragraph [0037]). c. As per claim*  
11 *3, Sharma teaches the claimed invention as described above.*  
12 *Furthermore, Sharma teaches wherein the client device is a*  
13 *cellular telephone (See page 3, paragraph [0037]).*

14 *d. As per claim 5, Sharma teaches the claimed invention as*  
15 *described above. Furthermore, Sharma teaches wherein the*  
16 *viewing is performed employing a viewing device collocated*  
17 *with said client device (See page 3, paragraph [0037]).*

18 *e. As per claim 6, Sharma teaches the claimed invention as*  
19 *described above, Furthermore, Sharma teaches wherein the*  
20 *viewing device depicts information. in a form including at*  
21 *least one of text, graphics, images, light display, or any*  
22 *combination of these (See page 3, paragraph [0037]) (Remark:*  
23 *It is inherent that the mobile device depicts information in*  
24 *at least one or more these forms in order to manage the*  
25 *network assets).*

26 In response, applicants respectfully state claims 2, 5 and 6 are  
27 dependent claims that depends on allowable claim 1, and are  
28 therefore allowable. Furthermore, it is not inherent that a  
29 mobile device will depict information in at least one or more of  
30 these forms as in these claims - which are indeed not about  
31 managing network assets as Sharma teaches. For example, the use  
32 of LEDs as light displays for is not necessarily an inherent  
33 feature of a network management mobile device. Examiner is  
34 requested to provide backup for this so-called inherentcy.

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1 Furthermore claim 6 is amended to include voice, to better  
2 protect the invention.

3 As per claim 7, Sharma teaches the claimed invention as  
4 described above. However, Sharma fails to teach wherein the  
5 step of selecting includes employing a menu.

6 Sawada teaches wherein the step of selecting includes  
7 employing a menu (See col. 2, lines 1-2).

8 It would have been obvious to one with ordinary skill in the  
9 art at the time the invention was made to incorporate  
10 wherein the step of selecting includes employing a menu as  
11 taught by Sawada in the claimed invention of Sharma in order  
12 to allow the user to exercise concentrated control over the  
13 home network devices through the homepage list and remotely  
14 control the home network devices via the homepage (See col.  
15 2, lines 3-6).

16 g. As per claim 8, Sharma teaches the claimed invention as  
17 described above. However, Sharma teaches wherein the step of  
18 viewing is performed employing a web- browser and the  
19 serving entity is a web-server.

20 Sawada teaches wherein the step of viewing is performed  
21 employing a web- browser and the serving entity is a  
22 web-server (See col. 2, lines 45-52 and col. 4, lines  
23 35-41).

24 It would have been obvious to one with ordinary skill in the  
25 art at the time the invention was made to incorporate the  
26 step of viewing is performed employing a web- browser and  
27 the serving entity is a web-server as taught by Sawada in  
28 the claimed invention of Sharma in order to allow the user  
29 to exercise concentrated control over the home network  
30 devices through the homepage list and remotely control the  
31 home network devices via the homepage (See col. 2, lines  
32 3-6).

33 h. As per claim 10, Sharma teaches the claimed invention as  
34 described above. Furthermore, Sharma teaches wherein the  
35 data network is the Intranet controlled by an Internet  
36 Service Provider (See page 14, paragraph [0153]).

37 In response, applicants respectfully state claims 7, 8, and 10  
38 are dependent claims that depends on allowable claim 1, and are  
39 therefore allowable. Furthermore, the cited reference (Sharma,

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1 paragraph [0153] on page 14) gives a collection of network  
2 examples, however, none of them states that the network is an  
3 Intranet controlled by an ISP.

4 *i. As per claim 12, Sharma teaches the claimed invention as*  
5 *described above. Furthermore, Sharma teaches serving entity*  
6 *employing attributes of said circuit switch network in*  
7 *authenticating said user (See page 7, paragraph [0061]).*

8 *j. As per claim 15, Sharma teaches the claimed invention as*  
9 *described above. Furthermore, Sharma teaches establishing*  
10 *credentials so that said at least one remote service can be*  
11 *manipulated in a secure manner on the serving entity (See*  
12 *page 3-4, paragraph [0092]).*

13 In response, applicants respectfully state claim 12 is a  
14 dependent claim that depends on allowable claim 1, and is  
15 therefore allowable. Furthermore, the cited reference (Sharma,  
16 paragraph [0092] on pages 3-4), refers to the use of ACLs  
17 organized in a hierarchy database and provide access privileges  
18 and permissions to network assets. Our claim focuses on  
19 manipulating a remote service in a secure manner. Access control  
20 defines who is authorized of accessing a resource and it does not  
21 necessarily imply that a resource can be manipulated and  
22 particularly in a secure manner, which may involve encryption of  
23 communication to and from the manipulated asset.

24 *k. As per claim 16, Sharma teaches the claimed invention as*  
25 *described above. -*  
26 *Furthermore, Sharma teaches wherein the step of viewing*  
27 *views the list on a viewing device in a manner that depends*  
28 *on the user's access privileges to said at least one remote*  
29 *service (See pages 3- 4, paragraph [0092]).*

30 *l. As per claim 17, Sharma teaches the claimed invention as*  
31 *described above. Furthermore, Sharma teaches the serving*  
32 *entity providing access to at least one service agent used*  
33 *to access and control said at least one remote service.*

34 In response, applicants respectfully state claims 16 and 17 are  
35 dependent claims that depends on allowable claim 1, and are

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1 therefore allowable. Furthermore, the applicants contend that  
2 Sharma apparently does not teach the use of service agents for  
3 accessing and controlling the said remote services. It may teach  
4 a network management system that has a connection path to a  
5 network asset but not of providing access to a service agent to  
6 access and control the network asset.

7 *m. As per claim 18, Sharma in view of Sawada teaches the*  
8 *claimed invention as described above. Furthermore, Sharma*  
9 *teaches wherein at least one of said at least one service*  
10 *agent is a computer software module executable on a computer*  
11 *(See page 6, paragraph [0052]).*

12 In response, applicants respectfully state claim 12 is a  
13 dependent claim that depends on allowable claim 1, and is  
14 therefore allowable. Furthermore, the applicants contend that  
15 Sharma in view of Sawada does not teach the use of service agents  
16 that are software modules that are executed on a computer. In  
17 particular, the cited reference (Sharma paragraph [0052] on page  
18 6) teaches about use of a PAN to connect to a network asset and  
19 provide network management capability over the PAN, however, it  
20 does not apparently teach the use of a service agent of any kind.

21 *n. As per claim 19, Sharma in view of Sawada teaches the*  
22 *claimed invention as described above. Furthermore, Sharma*  
23 *teaches activating said software module prior to invoking a*  
24 *particular remote service (See page 6, paragraph [0052]).*

25 In response, applicants respectfully state claim 12 is a  
26 dependent claim that depends on allowable claim 1, and is  
27 therefore allowable. Furthermore, the applicants contend that  
28 Sharma in view of Sawada does not teach the use of service agents  
29 that are software modules that are executed on a computer. In  
30 particular, the cited reference (Sharma paragraph [0052] on page  
31 6) teaches of about the use of a PAN to connect to a network  
32 asset and provide network management capability over the PAN,  
33 however, it does not teach the use of a service agent of any  
34 kind.

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1       *o. As per claim 20, Sharma in view of Sawada teaches the*  
2       *claimed invention as described above. Furthermore, Sharma*  
3       *teaches activating said software module on demand after a*  
4       *particular remote service has been invoked (See page 6,*  
5       *paragraph [0054]). .*

6       In response, applicants respectfully state that claim 20 is a  
7       dependent claim that depends on claim 18 and ultimately on claim  
8       1 and is therefore allowable. Furthermore, the applicants contend  
9       that Sharma in view of Sawada does not teach the use of service  
10      agents that are software modules that are executed on a computer.  
11      In particular, the cited reference (Sharma paragraph [0054] on  
12      page 6) teaches of a PAN network configuration for accessing  
13      network assets, however, it does not teach activating said  
14      software module on demand after a particular remote service has  
15      been invoked. Claim 20 is also therefore allowable.

16      *p. As per claim 21, Sharma in view of Sawada teaches the*  
17      *claimed invention as -*  
18      *described above. Furthermore, Sharma teaches storing said*  
19      *software module at a data repository (See page 8, paragraph*  
20      *[0068]).*

21      In response, applicants respectfully state that claim 21 is a  
22      dependent claim that depends on claim 18 and ultimately on claim  
23      1 and is therefore allowable. Furthermore, the applicants contend  
24      that Sharma in view of Sawada does not teach that [service agent]  
25      software modules are stored in a data repository. In particular,  
26      the cited reference (Sharma paragraph [0068] on page 8) teaches a  
27      distributed fault propagation and notification system, however,  
28      it does not teach storing said software module at a data  
29      repository.

30      *q. As per claim 22, Sharma in view of Sawada teaches the*  
31      *claimed invention as described above. Furthermore, Sharma*  
32      *teaches dynamically retrieving and activating said software*  
33      *module from the data repository after invoking a particular*  
34      *remote service (See page 6, paragraph [0054-0055]).*

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1 In response, applicants respectfully state that claim 20 is a  
2 dependent claim that depends on claim 18 and ultimately on claim  
3 1 and is therefore allowable. Furthermore, the applicants contend  
4 that Sharma in view of Sawada does not teach dynamically  
5 retrieving and activating said [service agent] software module  
6 from the data repository after invoking a particular remote  
7 service. In particular, the cited reference (Sharma paragraph  
8 [0054-0055] on pages 6 and 7) refers to different network  
9 management topologies, however, it does not teach dynamically  
10 retrieving and activating said [service agent] software module  
11 from the data repository after invoking a particular remote  
12 service.

13 *r. As per claim 24, Sharma et al in view of Sawada teaches*  
14 *the claimed invention as described above. Furthermore,*  
15 *Sharma fails to teach wherein said wireless, circuit-*  
16 *switched, voice telephony network is a second generation,*  
17 *digital, cellular network (See page 3, paragraph [0037]).*

18 In response, applicants respectfully state claim 24 is a  
19 dependent claim that depends on allowable claim 1, and is  
20 therefore allowable. Furthermore, the applicants agree with the  
21 examiner's statement "...Sharma fails to teach..." showing the  
22 examiner appears to be in agreement with the applicants regarding  
23 this claim. Thus this claim is apparently not rejected.

24 *s. As per claim 27, Sharma teaches the claimed invention as*  
25 *described above. Furthermore, Sharma teaches an article of*  
26 *manufacture comprising a computer usable medium having*  
27 *computer readable program code means embodied therein for*  
28 *causing a user to interact with at least one remote service,*  
29 *the computer readable program code means in said article of*  
30 *manufacture comprising computer readable program code means*  
31 *for causing a computer to effect the steps of claim 1 (See*  
32 *page 3, paragraph [0052- 0054]).*

33 In response, applicants respectfully state claim 27 is a  
34 dependent claim that depends on allowable claim 1, and is  
35 therefore allowable. Furthermore, the applicants do not fully

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1 understand the examiner's statement "... (See page 3, paragraph  
2 [0052-0054])." as these paragraphs are not on page 3 and they  
3 refer to different network management topologies that are  
4 applicable to Sharma's invention and not about an article of  
5 manufacture.

6 *t. As per claim 28, Sharma et al teaches the claimed*  
7 *invention as described above. -*  
8 *Furthermore, Sharma et al teaches a program storage device*  
9 *readable by machine, tangibly embodying a program of*  
10 *instructions executable by the machine to perform method*  
11 *steps for causing a user to interact with at least one*  
12 *remote service, said method steps comprising the steps of*  
13 *claim 1 (See page 3, paragraph [0052-0054]).*

14 In response, applicants respectfully state claim 28 is a  
15 dependent claim that depends on allowable claim 1, and is  
16 therefore allowable. Furthermore, the applicants do not fully  
17 understand the examiner's statement "... (See page 3, paragraph  
18 [0052-0054])." as these paragraphs are not on page 3 and they  
19 refer to different network management topologies that are  
20 applicable to Sharma's invention and not about a program storage  
21 device.

22 *v. As per claim 30, Sharma et al in view of Sawada teaches*  
23 *the claimed invention as described. Furthermore, Sharma et*  
24 *al teaches a computer program product comprising a computer*  
25 *usable medium having computer readable program code means*  
26 *embodied therein for causing a user to interact with at*  
27 *least one remote service, the computer readable program code*  
28 *means in said computer program product comprising computer*  
29 *readable program code means for causing a computer to effect*  
30 *the functions of claim 28 (See page 3, paragraph*  
31 *[0052-0054]).*

32 In response, applicants respectfully state claim 30 is a  
33 dependent claim that ultimately depends on allowable claim 1, and  
34 is therefore allowable. Furthermore, the applicants do not fully  
35 understand the examiner's statement "... (See page 3, paragraph  
36 [0052-0054])." as these paragraphs are not on page 3 and they

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1 refer to different network management topologies that are  
2 applicable to Sharma's invention and not about a computer usable  
3 program.

4 6. Claims 4, 9, 11, 13-14, 23 and 25- 26 are rejected under 35  
5 U.S.C. 103(a) as being unpatentable over U.S. Patent  
6 Application No. 2002/0068559 to Sharma et al in view of U.S.  
7 Patent No. 6,735,619 to Sawada as applied to claim 1 above,  
8 and further in view of U.S. Patent No. 6,308,213 to  
9 Valencia.

10 a. As per claim 4, Sharma et al in view of Sawada teaches  
11 the claimed invention as described above. However, Sharma et  
12 al in view of Sawada fails to teach wherein the step of  
13 connecting includes dialing-up directly to the serving  
14 entity.

15 Valencia teaches a wherein the step of connecting includes  
16 dialing-up directly to the serving entity (See col. 2, lines  
17 5-10).

18 It would have been obvious to one with ordinary skill in the  
19 art at the time the invention was made to incorporate  
20 wherein the step of connecting includes dialing-up directly  
21 to the serving entity as taught by Valencia in the claimed  
22 invention of Sharma et al in view of Sawada in order to  
23 access a private local network through an internet access  
24 service (See col. 1, lines 11-12).

25 In response, applicants respectfully state claims 4, 9, 11,  
26 13-14, 23 and 25- 26 are dependent claims that depends on  
27 allowable claim 1, and are therefore allowable. Furthermore, the  
28 cited reference to Valencia (col. 2, ln. 5-10) teaches about a  
29 direct dial-up between the NAS and the home gateway and not a  
30 direct dial-up between the user and his client device and the  
31 serving entity. The presence of the NAS in between the remote  
32 client and the home gateway is an aspect of Valencia's invention  
33 that results from the necessary existence of an ISP between the  
34 client device and the home gateway. As discussed in our response  
35 to 3.a above, the presence of ISP is not a required aspect of our  
36 invention.

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1        *b. As per claim 9, Sharma et al in view of Sawada teaches*  
2        *the claimed invention as described above. However, Sharma et*  
3        *al in view of Sawada fails to teach wherein the step of*  
4        *connecting includes dialing-up to the serving entity through*  
5        *a data network to which the serving entity is connected.*

6        *Valencia teaches wherein the step of connecting includes*  
7        *dialing-up to the serving entity through a data network to*  
8        *which the serving entity is connected (See col. 2, lines*  
9        *11-19).*

10       *It would have been obvious to one with ordinary skill in the*  
11       *art at the time the invention was made to incorporate*  
12       *wherein the step of connecting includes dialing-up to the*  
13       *serving entity through a data network to which the serving*  
14       *entity is connected as taught by Valencia in the claimed*  
15       *invention of Sharma et al in view of Sawada in order to*  
16       *access a private local network trough an internet access*  
17       *service (See col. 1, lines 11-12).*

18       In response, applicants respectfully state claim 9 is a dependent  
19       claim that depends on allowable claim 1, and is therefore  
20       allowable. Furthermore, the cited reference to Valencia (col. 2,  
21       ln. 11-19) teaches about the use of the L2F and PPP protocols and  
22       that the client device could be managed by databases eventually  
23       creating the illusion of a direct dial-up connection (although  
24       not a real, physical dial-up connection). These aspects of  
25       Valencia's invention are not applicable to our invention that  
26       does not requires the use of any databases to manage the client  
27       device.

28       *c. As per claim 11, Sharma et al in view of Sawada teaches*  
29       *the claimed invention as described above. Furthermore,*  
30       *Sharma et al teaches wherein the data network uses the*  
31       *TCP/IP protocol suite for transporting information (See page*  
32       *9, paragraph [0076]).*

33       In response, applicants respectfully state claim 11 is a  
34       dependent claim that depends on allowable claim 1, and is  
35       therefore allowable. Furthermore, the cited reference to Sharma  
36       (paragraph [0076] on page 9) teaches (or to be more precise,  
37       implies) about the use of Internet protocols on the network

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1 between the NMS and the network assets and not the network  
2 between the client device and the serving entity (or the NMS in  
3 Sharma's case).

4 d. As per claim 13, Sharma et al in view of Sawada teaches  
5 the claimed invention as described above. However, Sharma et  
6 al in view of Sawada fails to teach wherein said attributes  
7 include a telephone number of said client device.

8 Valencia teaches wherein said attributes include a telephone  
9 number of said client device (See col. 4, lines 15-23).

10 It would have been obvious to one with ordinary skill in the  
11 art at the time the invention was made to incorporate  
12 wherein said attributes include a telephone number of said  
13 client device as taught by Valencia in the claimed invention  
14 of Sharma et al in view of Sawada in order to access a  
15 private local network through an internet access service (See  
16 col. 1, lines 11-12).

17 In response, applicants respectfully state claim 13 is a  
18 dependent claim that depends on allowable claim 1, and is  
19 therefore allowable. Furthermore, the cited reference to Valencia  
20 (col. 4, ln. 15-23) teaches of a direct dial-up connection  
21 between the client device and the NAS and the use of the LCP  
22 packets of the PPP protocol to test this data link. This  
23 reference does not teach using a telephone number of a client  
24 device as a means of authenticating a user directly by the  
25 serving entity.

26 e. As per claim 14, Sharma et al in view of Sawada teaches  
27 the claimed invention as described above. However, Sharma et  
28 al in view of Sawada fails to teach wherein said attributes  
29 include a telephone number of said serving entity.

30 Valencia teaches wherein said attributes include a telephone  
31 number of said serving entity (See col. 4, lines 15-23).

32 It would have been obvious to one with ordinary skill in the  
33 art at the time the invention was made to incorporate  
34 wherein said attributes include a telephone number of said  
35 serving entity as taught by Valencia in the claimed  
36 invention of Sharma et al in view of Sawada in order to

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1       *access a private local network through an internet access*  
2       *service (See col. 1, lines 11-12).*

3       In response, applicants respectfully state claim 14 is a  
4       dependent claim that depends on allowable claim 1, and is  
5       therefore allowable. Furthermore, the cited reference to Valencia  
6       (col. 4, ln. 15-23) teaches of a direct dial-up connection  
7       between the client device and the NAS and the use of the LCP  
8       packets of the PPP protocol to test this data link. This  
9       reference does not teach using a telephone number of a serving  
10      entity as a means of authenticating a user directly by the  
11      serving entity.

12       *f . As per claim 23, Sharma et al teaches the claimed*  
13       *invention as described above. However, Sharma fails to teach*  
14       *wherein said wireless, circuit-switched, voice telephony*  
15       *network is a first generation, analog, cellular network.*

16       Valencia teaches wherein said wireless, circuit-switched,  
17       voice telephony network is a first generation, analog,  
18       cellular network (See col. 3, lines 44-47).

19       It would have been obvious to one with ordinary skill in the  
20       art at the time the invention was made to incorporate  
21       wherein said wireless, circuit-switched, voice telephony  
22       network is a first generation, analog, cellular network as  
23       taught by Valencia in the claimed invention of Sharma et al  
24       in view of Sawada in order to access a private local network  
25       through an internet access service (See col. 1, lines 11-12).

26      In response, applicants respectfully state claim 23 is a  
27      dependent claim that depends on allowable claim 1, and is  
28      therefore allowable. Furthermore, the cited reference to Valencia  
29      (col. 3, ln. 44-47) teaches of a client device coupled to the NAS  
30      of an ISP that accesses the Internet infrastructure using the  
31      PSTN. However, the cited reference to Valencia does not teach  
32      about the use of a first generation analog, cellular network --  
33      this network is an entirely distinct network to Valencia's PSTN.

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1 g. As per claim 25, Sharma et al teaches the claimed  
2 invention as described above. However, Sharma et al in view  
3 of Sawada fails to teach wherein the step of dialing-up  
4 directly to the service entity further includes passing  
5 dialing signaling and control data to the serving entity  
6 through an intermediary data network.

7 Valencia teaches wherein the step of dialing-up directly to  
8 the service entity further includes passing dialing  
9 signaling and control data to the serving entity through an  
10 intermediary data network (See col. 3, lines 44-54).

11 It would have been obvious to one with ordinary skill in the  
12 art at the time the invention was made to incorporate  
13 wherein the step of dialing-up directly to the service  
14 entity further includes passing dialing signaling and  
15 control data to the serving entity through an intermediary  
16 data network as taught by Valencia in the claimed invention  
17 of Sharma et al in view of Sawada in order to access a  
18 private local network trough an internet access service (See  
19 col. 1, lines 11-12).

20 In response, applicants respectfully state claim 25 is a  
21 dependent claim that depends on allowable claim 1, and is  
22 therefore allowable. Furthermore, applicants dispute the  
23 obviousness based on non-related art.

24 h. As per claim 26, Sharma et al teaches the claimed  
25 invention as described above. However, Sharma et al in view  
26 of Sawada fails to teach wherein the step of dialing-up to  
27 the serving entity through a data network, further includes  
28 dialing-up to the serving entity through a sequence of at  
29 least one data network, the last one of which the serving  
30 entity is attached to.

31 Valencia teaches wherein the step of dialing-up to the  
32 serving entity through a data network, further includes  
33 dialing-up to the serving entity through a sequence of at  
34 least one data network, the last one of which the serving  
35 entity is attached to (See col. 3, lines 60-67 and col. 4,  
36 lines 1-14).

37 It would have been obvious to one with ordinary skill in the  
38 art at the time the invention was made to incorporate  
39 wherein the step of dialing-up to the serving entity through  
40 a data network, further includes dialing-up to the serving  
41 entity through a sequence of at least one data network, the

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1        *last one of which the serving entity is. attached to as*  
2        *taught by Sharma et al in the claimed invention of Valencia*  
3        *in order to access a private local network through an*  
4        *internet access service (See col. 1, lines 11-12).*

5        In response, applicants respectfully state claim 26 is a  
6        dependent claim that depends on an allowable claim, and is  
7        therefore allowable. Furthermore, the cited reference to Valencia  
8        (col. 3, ln. 60-67 and col. 4, ln. 1-14) fails, we contend, to  
9        teach or make obvious the use of multiple data networks between  
10       the client device and the serving entity, as our invention does  
11       (paragraph [0025] on page 3).

12       *7. Claims 32-35 are rejected under 35 U.S.C. 103(a) as being*  
13       *unpatentable over U.S. Patent No. 6,308,213 to Valencia in*  
14       *view of US. Patent No. 6,735,619 to Sawada.*

15       *a. As per claim 32, Valencia teaches the claimed invention*  
16       *as described above. However, Valencia fails to teach wherein*  
17       *said browser server is used to obtain, organize, and*  
18       *manipulate data received from and data sent to the client*  
19       *device through the protocol transport module.*

20       *Sawada teaches wherein said browser server is used to*  
21       *obtain, organize, and manipulate data received from and data*  
22       *sent to the client device through the protocol transport*  
23       *module (See col. 2, lines 44-52).*

24       *It would have been obvious to one with ordinary skill in the*  
25       *art at the time the invention to incorporate wherein said*  
26       *browser server is used to obtain, organize, and manipulate*  
27       *data received from and data sent to the client device*  
28       *through the protocol transport module in order to make it*  
29       *easy to control home network devices (See col. 2, lines*  
30       *60-63).*

31       In response, applicants respectfully state claim 32 is a  
32       dependent claim that depends on an allowable claim, and is  
33       therefore allowable. Furthermore, the cited reference to Sawada  
34       (col. 2, ln. 44-52) teaches using an apparatus with a WWW browser  
35       (our invention does not require the use of a WWW browser) to  
36       instruct the home network gateway apparatus to send control

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1 information to a home network device to execute an operation. The  
2 cited reference does teach using a browser server to obtain,  
3 organize, and manipulate data received from and data sent to the  
4 client device through the protocol transport module.

5 *b. As per claim 33, Valencia teaches the claimed invention*  
6 *as described above. However, Valencia fails to teach wherein*  
7 *said data sent to the client device are displayed and viewed*  
8 *by the browser application in the client device.*

9 *Sawada teaches fails to teach wherein said data sent to the*  
10 *client device are displayed and viewed by the browser*  
11 *application in the client device (See col. 1, lines 39- 42).*

12 *It would have been obvious to one with ordinary skill in the*  
13 *art at the time the invention was made to incorporate fails*  
14 *to teach wherein said data sent to the client -*  
15 *device are displayed and viewed by the browser application*  
16 *in the client device as taught by Sawada in the claimed*  
17 *invention of Valencia in order to make it easy to control*  
18 *home network devices (See col. 2, lines 60-63).*

19 In response, applicants respectfully state claim 33 is a  
20 dependent claim that depends on an allowable claim, and is  
21 therefore allowable. Furthermore, the applicants agree with the  
22 examiner's statement "...Sawada teaches fails to teach...", and  
23 dispute the obviousness.

24 *c. As per claim 34, Valencia teaches the claimed invention*  
25 *as described above. However, Valencia fails to teach wherein*  
26 *said data sent includes a list of services that are*  
27 *accessible by the client device.*

28 *Sawada teaches wherein said data sent includes a list of*  
29 *services that are accessible by the client device (See col.*  
30 *1, lines 39-42)*

31 *It would have been obvious to one with ordinary skill in the*  
32 *art at the time the invention was made to incorporate*  
33 *wherein said data sent includes a list of services that are*  
34 *accessible by the client device as taught by Sawada in the*  
35 *claimed invention of Valencia in order to make it easy to*  
36 *control home network devices (See col. 2, lines 60- 63).*

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1 In response, applicants respectfully state claim 34 is a  
2 dependent claim that depends on an allowable claim, and is  
3 therefore allowable. Furthermore, the cited reference to Sawada  
4 (col. 1, ln. 39-42) teaches displaying a list of home network  
5 devices on the display of the client device. However, displaying  
6 a device does not imply that a service (which is what our  
7 invention focuses on instead of simply devices) is accessible by  
8 the device. Displaying the existence of, for example, an  
9 air-conditioning service in a house, does not mean that one can  
10 also access the service and change its operation. This is what  
11 our invention means by accessing, and this is not taught, we  
12 believe, by the cited reference to Sawada.

13 *d. As per claim 35, Valencia teaches the claimed invention*  
14 *as described above. However, Valencia fails to teach wherein*  
15 *said data received by the browser application in the client*  
16 *device include a selection of at least one service the user*  
17 *of the client device controls and an action to be taken for*  
18 *a selected service, and upon receipt of the action the*  
19 *browser server interacts with a particular service agent to*  
20 *implement the control logic for controlling the selected*  
21 *service, wherein a control signal generated by the service*  
22 *agent exits the apparatus through the client port.*

23 *Sawada teaches wherein said data received by the browser*  
24 *application in the client device include a selection of at*  
25 *least one service the user of the client device controls and*  
26 *an action to be taken for a selected service, and upon*  
27 *receipt of the action the browser server interacts with a*  
28 *particular service agent to implement the control logic for*  
29 *controlling the selected service, wherein a control signal*  
30 *generated by the service agent exits the apparatus through*  
31 *the client port (See col. 2, lines 27-52).*

32 *It would have been obvious to one with ordinary skill in the*  
33 *art at the time the invention was made to incorporate*  
34 *wherein said data received by the browser application in the*  
35 *client device include a selection of at least one service*  
36 *the user of the client device controls and an action to be*  
37 *taken for a selected service, and upon receipt of the action*  
38 *the browser server interacts with a particular service*  
39 *agent to implement the control logic for controlling the*  
40 *selected service, wherein a control signal generated by the*

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1 *service agent exits the apparatus through the client port as*  
2 *taught by Sawada in the claimed invention of Valencia in*  
3 *order to make remotely control home network devices*  
4 *available using wide-area network such as the Internet (See*  
5 *col. 1, lines 30-34).*

6 In response, applicants respectfully state claim 35 is a  
7 dependent claim that depends on an allowable claim, and is  
8 therefore allowable. Furthermore, the cited reference to Sawada  
9 (col. 2, ln. 27-52) fails to teach, we contend, the use of  
10 service agents with which the browser server interacts to adjust  
11 the behavior the service controlled by the service agent.

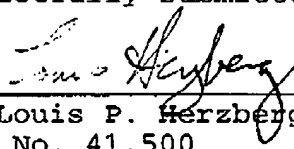
12 A listing of the claims is provided as required in the new USPTO  
13 amendment practice per 37 CFR 1.121.

14 It is anticipated that this amendment brings the application to  
15 allowance of all the claims. Favorable action is respectfully  
16 solicited. In the unlikely event that any claim remains  
17 rejected, please contact the undersigned by phone in order to  
18 discuss the application.

19 Please charge any fee necessary to enter this paper to deposit  
20 account 09-0468.

21 Respectfully submitted,

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